



NORLITE CORPORATION

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September 3, 2012

Karen M. Gaidasz, CPESC
Environmental Analyst
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 08/08/12- 08/29/12
Kiln 2: 08/08/12- 08/29/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 08/08/12 thru 08/29/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The majority of the cutoffs were found to be caused by a partially plugged reference port for the differential pressure monitor associated with the Rear Chamber System on Kiln 2. The reference port was cleared and the monitor recalibrated. Furthermore, Norlite made adjustments to the Rear Chamber control system to try to better accommodate the pressure pulses in the kiln system. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically. Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvancouver@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments
Tita LaGrimas, Tradebe w/attachments

DCL: 2410



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
08/08/12 - 08/29/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/9/2012	7:40:41	8/9/2012	7:43:09	0:02:28	111	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Rate Span	Scrubber Recirc. Rate		Adjusted Scrubber Recirc. Rate
8/12/2012	0:47:19	8/12/2012	1:50:08	1:02:49	112	Malfunction	The Kiln Operator Attempted to Reestablish LGF Fuel Flow Which Caused a Fuel Flow Surge That Triggered a Pressure Pulse to Occur in the Kiln System	Front Kiln Pressure, 1 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
8/13/2012	7:42:49	8/13/2012	7:43:51	0:01:02	113	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
8/13/2012	16:40:28	8/13/2012	16:45:05	0:04:37	114	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
8/14/2012	13:31:20	8/14/2012	13:38:03	0:06:43	115	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
8/18/2012	1:58:05	8/18/2012	1:59:28	0:01:23	116	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused a Pressure Pulse in the Kiln System	Front Kiln Pressure, 3 Second Delay	Opl	Adjusted Fuel Flow and LGF Line Pressure
8/25/2012	1:18:57	8/25/2012	1:19:55	0:00:58	117	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
8/26/2012	5:56:19	8/26/2012	5:57:18	0:00:59	118	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions / High CO's	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/29/2012	16:10:08	8/29/2012	16:10:26	0:00:18	119	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow
8/29/2012	16:15:19	8/29/2012	16:15:42	0:00:23	120	Malfunction	Kiln Operators Were Using Valves to Control Fuel Flow. A Fuel Flow Surge was Experienced Due to High LGF Line Pressure Which Caused the Instantaneous Upper Instrument Setpoint to be Reached for LGF Span	LGF Flow	Span	Adjusted Fuel Flow



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
08/08/12 - 08/29/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
8/8/2012	16:05:43	8/8/2012	16:06:40	0:00:57	310	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/11/2012	7:31:55	8/11/2012	7:32:18	0:00:23	311	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Line Pressure and LGF Flow
8/17/2012	11:06:46	8/17/2012	11:57:04	0:50:18	312	Malfunction	An Investigation Revealed the Reference Port for the Rear Chamber Differential Pressure System Was Partially Plugged, Causing the System to Reach the Span Limit	Back Chamber Pressure, 1 Second Delay	Opl	I & E Cleaned Out the Reference Port and Recalibrated the System
8/17/2012	15:28:13	8/17/2012	15:32:12	0:03:59	313	Malfunction	An Investigation Revealed the Reference Port for the Rear Chamber Differential Pressure System Was Partially Plugged, Causing the System to Reach the Span Limit	Back Chamber Pressure, 1 Second Delay	Opl	I & E Cleaned Out the Reference Port and Recalibrated the System
8/17/2012	16:22:17	8/17/2012	16:44:16	0:21:59	314	Malfunction	An Investigation Revealed the Reference Port for the Rear Chamber Differential Pressure System Was Partially Plugged, Causing the System to Reach the Span Limit	Back Chamber Pressure, 1 Second Delay	Opl	I & E Cleaned Out the Reference Port and Recalibrated the System
8/18/2012	18:50:43	8/18/2012	18:56:32	0:05:49	315	Malfunction	An Investigation Revealed the Reference Port for the Rear Chamber Differential Pressure System Was Partially Plugged, Causing the System to Reach the Span Limit	Back Chamber Pressure, 1 Second Delay	Opl	I & E Cleaned Out the Reference Port and Recalibrated the System